

Exhibit B

From: [Long, Alex](#)
To: [Ferguson, Russ](#); [Trimmer, Christina D.](#)
Cc: [Ewing, Chad](#); [Michelle Dunn](#); [Matthew Tomsic](#); [Sidebottom, Cecilia M.](#)
Subject: RE: Hayward v. Ningbo C.F., Case No. 3:20-CV-710
Date: Tuesday, September 3, 2024 10:16:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image430124.png](#)

External (along@shumaker.com)

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Dear Russ:

In your email to me of Thursday April 25, 2024, you said: “We will not, however, litigate with you by email or outside of Court.” So, I’m sure you will understand our surprise at your recent missives.

As you know, we have always been open to good faith dialog. However, your co-counsel Erik Belt recently refused to entertain even a simple confidentiality request with respect to settlement discussions. Likewise, both you and Chad Ewing abused the confidences ordered by the Court when we were in Asheville with respect to Ms. Lu’s bank account.

If you, your co-counsel, and your client are newly open to engage in good faith dialog, please advise.

Best,

Alex

S. Alex Long

Attorney at Law

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From: Ferguson, Russ <Russ.Ferguson@wbd-us.com>

Sent: Tuesday, September 3, 2024 7:11 PM

To: Trimmer, Christina D. <ctrimmer@shumaker.com>; Long, Alex <along@shumaker.com>
Cc: Ewing, Chad <Chad.Ewing@wbd-us.com>
Subject: Re: Hayward v. Ningbo C.F., Case No. 3:20-CV-710

CAUTION: External Email

Alex and Christy,

Do you plan to respond to my August 9th letter? If so, can you let me know when we can expect a response?

Many thanks,
Russ

Russ Ferguson

Partner

Womble Bond Dickinson (US) LLP

d: [704-331-4920](tel:704-331-4920)

e: Russ.Ferguson@wbd-us.com

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From: Brafford, Carla <Carla.Brafford@wbd-us.com>

Sent: Friday, August 9, 2024 4:55 PM

To: 'Trimmer, Christina D.' <ctrimmer@shumaker.com>; Long, Alex <along@shumaker.com>

Cc: Ferguson, Russ <Russ.Ferguson@wbd-us.com>

Subject: Hayward v. Ningbo C.F., Case No. 3:20-CV-710

On behalf of Russ Ferguson, please see the attached letter.

Carla Brafford

She/Her

Legal Practice Assistant

Womble Bond Dickinson (US) LLP

d: [704-444-2903](tel:7044442903)

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